

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VLSI TECHNOLOGY LLC,)	FILED UNDER SEAL
)	
Plaintiff,)	
v.)	
)	C.A. No. 18-966-CFC-CJB
INTEL CORPORATION,)	
)	
Defendant.)	
_____)	

**DECLARATION OF VLSI TECHNOLOGY LLC’S CEO MICHAEL
STOLARSKI IN RESPONSE TO COURT’S ORAL ORDERS
DATED JULY 11, 2022**

I, Michael Stolarski, hereby declare as follows:

1. I am the Chief Executive Officer of VLSI Technology, LLC (“VLSI”), and have had that role since 2016. Unless otherwise stated, I have personal knowledge of the facts stated in this declaration. I submit this declaration in response to the Court’s July 11, 2022 Oral Orders concerning compliance with the Court’s April 18, 2022 Standing Order Regarding Third-Party Litigation Funding Arrangements and April 18, 2022 Standing Order Regarding Disclosure Statements Required by Federal Rule of Civil Procedure 7.1.

2. Since its formation in June 2016, VLSI has been (and is) a Delaware limited liability company. I run VLSI on a day-to-day basis, and I report to VLSI’s Board, which in general is responsible for making significant strategic decisions on VLSI’s behalf. VLSI’s Board is presently composed of three people: myself, Eran Zur, and Ami Patel Shah.

3. VLSI is a subsidiary of CF VLSI Holdings LLC (“VLSI Holdings”), which is also a Delaware limited liability company. All of VLSI’s funding for this litigation is provided by VLSI Holdings. I am informed and believe that VLSI Holdings obtains all such funding from VLSI Holdings’ owners (discussed below), and not from any third party litigation sources.

4. VLSI Holdings is owned by a total of ten separate entities which are identified in, among other places, VLSI’s Second Amended and Restated LLC

Agreement (which has previously been produced to Defendant Intel and portions filed with this Court). Specifically, the ten entities that own VLSI Holdings are:

Majority owner:

FCOF IV UST LLC (hereinafter “FCO IV”), a Delaware limited liability company,

Minority owners:

FTS SIP Investments II LLC, a Delaware limited liability company,

FCO MA LSS LP, a Delaware Limited Partnership,

FCO MA IV UB Securities LLC, a Delaware limited liability company,

FCO MA II UB Securities LLC, a Delaware limited liability company,

FCO MA SC II Investments LLC, a Delaware limited liability company,

FCO MA Centre Street LP, a Delaware Limited Partnership,

FCO MA ML Investments II LLC, a Delaware limited liability company,

FCO MA MI LP, a Delaware Limited Partnership, and

FGOY II Investments LLC.

5. I am informed that FCO IV, the majority owner of VLSI Holdings, is wholly owned by a closed end investment fund family comprised of six individual funds, with combined total net assets of approximately \$1.8 billion as of June 30, 2022, all of which are managed by affiliates of Fortress Investment Group LLC (“Fortress”), and that the ultimate owners of FCO IV are hundreds of outside

investors that are composed of pension and retirement funds, sovereign wealth funds, foundations, high net worth individuals, endowments and other institutional investors, each of which individually owns less than a 10% indirect interest in VLSI Holdings. Likewise, I am informed by representatives of Fortress that the nine minority owners of VLSI Holdings are investment funds that are managed by Fortress on behalf of outside institutional investors, each of which individually owns less than a 10% interest in VLSI Holdings.

6. All decisions concerning the conduct and management of this litigation are made either by me as CEO of VLSI, or by VLSI's Board of Directors (of which I am a member). In my nearly six years as CEO of VLSI, to the best of my knowledge and recollection, I have had no communications with outside investors in any of the entities that own VLSI Holdings, and those investors play no role in management of VLSI or in making decisions concerning this litigation.

7. I hereby certify that, to the best of my knowledge, VLSI has complied with the Court's Standing Orders dated April 18, 2022 Regarding Third-Party Litigation Funding Arrangements and Regarding Disclosure Statements Required by Federal Rule of Civil Procedure 7.1.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 15, 2022

A handwritten signature in black ink, appearing to read "Michael Stolarski", written over a horizontal line.

Michael Stolarski
Chief Executive Officer,
VLSI Technology LLC